

DBE / ACDBE Reevaluation Process – Frequently Asked Questions (FAQ)

1. Why is MaineDOT conducting a reevaluation of DBE and ACDBE firms?

Effective October 3, 2025, the U.S. Department of Transportation revised the DBE and ACDBE regulations at 49 CFR § 26.67. These revisions changed how social and economic disadvantages are evaluated. As a result, MaineDOT is required to reevaluate all Maine-based DBE and ACDBE firms under the revised regulatory standards.

2. Who is required to participate in the reevaluation?

Each individual whose ownership and control in a Maine-based DBE or ACDBE firm contribute to at least 51 percent must participate in the reevaluation process. If a firm has multiple qualifying owners, each owner must submit their own materials.

3. What materials are required as part of the reevaluation?

Each qualifying owner must submit:

- A Personal Narrative of Social and Economic Disadvantage
- A Personal Net Worth (PNW) Statement
- Supporting financial documentation sufficient to verify the information reported in the PNW Statement

4. What is a Personal Narrative of Social and Economic Disadvantage?

The Personal Narrative is a written statement describing your own individual experiences of social and economic disadvantage in American society. It must:

- Identify **specific incidents** that occurred in the **United States**;
- Explain how those incidents created barriers to education, employment, business opportunities, or access to capital;
- Demonstrate **material economic harm**; and
- Compare your outcomes to those of **similarly situated persons**.

General business history, market conditions, or group-based assumptions alone do not meet the federal standard.

5. Is there still a presumption of social or economic disadvantage?

No. Under the revised regulations, there is no presumption of social or economic disadvantage based on race, gender, or any other characteristic. Each qualifying owner must demonstrate social and economic disadvantage based on their own individualized experiences. Information submitted should focus on personal circumstances

and barriers unrelated to race or gender. MaineDOT evaluates eligibility based on a **preponderance of the evidence**.

6. Can MaineDOT help me write or edit my Personal Narrative?

No. While MaineDOT staff can explain regulatory requirements and procedures, staff cannot write, edit, or advise on the substance of a Personal Narrative or financial submissions.

7. What guidance is available to help me understand the Personal Narrative requirement?

MaineDOT has developed a **Guidance Document on Writing a Personal Narrative of Social and Economic Disadvantage**, which explains the regulatory requirements and the level of detail needed. Applicants are strongly encouraged to review this guidance before submitting materials.

8. What is the Personal Net Worth (PNW) Statement used for?

The PNW Statement is used to evaluate whether an owner meets the economic eligibility requirements of the DBE and ACDBE programs. MaineDOT reviews the statement together with supporting documentation to verify assets, liabilities, and overall net worth.

9. What supporting documentation is required for the PNW Statement?

Supporting documentation may include, but is not limited to:

- Federal tax returns;
- Bank, retirement, and investment account statements;
- Real property documentation;
- Loan or credit statements; and
- Other financial records needed to verify the information reported.

Failure to provide adequate supporting documentation may result in a determination that economic eligibility has not been demonstrated.

10. What happens if my submission is incomplete or lacks sufficient detail?

If your submission does not contain sufficient detail for MaineDOT to decide, you may be notified of deficiencies and allowed to submit additional information. If deficiencies are not addressed by the stated deadline, MaineDOT will proceed with a determination based on the information in the record.

11. How long will the reevaluation process take?

Processing times may vary depending on the completeness of submissions and the volume of reevaluations. MaineDOT will make determinations as efficiently as possible once all required materials are received.

12. What happens if my firm does not meet the eligibility requirements after reevaluation?

If MaineDOT determines that eligibility requirements are not met, the firm will be notified in writing and informed of applicable appeal or reconsideration rights in accordance with federal regulations.

13. Will my approved NAICS codes be affected by the reevaluation?

Your firm remains certified only for the NAICS codes approved by MaineDOT. Requests to add or modify NAICS codes must be submitted separately with supporting documentation.

14. Is MaineDOT offering any informational sessions?

Yes. MaineDOT will hold an informational webinar for Maine-based DBE and ACDBE firms to explain the reevaluation process and applicable requirements. The webinar will not provide individualized advice or assistance with drafting narratives or financial documents.

15. Are contractors or consultants required to take any action as part of the reevaluation?

No. The reevaluation process applies to DBE and ACDBE firms. Contractors and consultants are not required to submit materials or take any action beyond standard DBE compliance responsibilities.

16. Who should I contact if I have questions?

If you have **procedural questions** regarding the reevaluation process, submission deadlines, or required forms, please contact Mary Bryant from the MaineDOT Civil Rights Office at mary.bryant@maine.gov. MaineDOT staff cannot provide advice on what to include in a Personal Narrative or PNW Statement.